

GIORDANO, HALLERAN & CIESLA
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

MATTHEW N. FIOROVANTI, ESQ.
ALSO ADMITTED TO PRACTICE IN NY
MFIOROVANTI@GHCLAW.COM
DIRECT DIAL: (732) 219-5492

(732) 741-3900
FAX: (732) 224-6599

www.ghclaw.com

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Client/Matter No. 17773/5

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: William Freed d/b/a Freed Chiropractic Center
vs: Metro Marketing Inc., Ariel Freud and John Does 1-10
No: 3:12-cv-06201-JAP-TJB

Dear Judge Bongiovanni,

This firm is local counsel to plaintiff William Freed d/b/a Freed Chiropractic Center ("Plaintiff") in the above-reference matter. Please accept this letter as a request for an Order pursuant to L. Civ. R. 7.1(d)(5) for an extension of (14) days to respond to Defendants' Motion to Dismiss Or, In The Alternative, For Summary Judgment (Doc. #15) and for an extension of the return date of said motion. This extension is requested to adequately address the issues in Defendant's motion.

Plaintiff's counsel contacted Defendants' counsel for their position on this extension and they are in agreement to same. Attached is a proposed consent order.

Respectfully submitted,


MATTHEW N. FIOROVANTI

MNF/cmt

cc: Jeffrey J. Greenbaum (*via ECF*)
Brian N. Biglin (*via ECF*)
Brian J. Wanca (*via email*)

Docs #1230413-v1